

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

DANIEL NOTESTEIN,)
BLOCKTRADES INTERNATIONAL, LTD.,)
ANDREW CHANEY,)
SZYMON LAPINSKI,)
ADAM DODSON,)
ELMER LIN,)
DANIEL HENSLEY,)
MICHAEL WOLF,)
MATHIEU GAGNON, and)
MARTIN LEES)

Plaintiffs

Civil Action No.: 7:20-cv-000342

v.

BITTREX, INC.,)
and)
J. DOE)

Defendants

and

STEEMIT, INC.

Third-Party Defendants

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Now come the Plaintiffs, by counsel, and hereby move this Court for leave to amend the Complaint previously filed in this case. In support of this Motion, Plaintiffs show the following:

1. Plaintiff wishes to substitute Steemit, Inc. for J. Doe.
2. Steemit, Inc. is a party to this action by way of the Amended Counterclaim filed by Defendant Bittrex, Inc.
3. A copy of the proposed Amended Complaint is attached.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file the

proposed Amended Complaint.

Respectfully submitted this 14th day of June, 2021,

DANIEL NOTESTEIN
BLOCKTRADES INTERNATIONAL, LTD.
ANDREW CHANEY
SZYMON LAPINSKI
ADAM DODSON
ELMER LIN
DANIEL HENSLEY
MICHAEL WOLF
MATHIEU GAGNON
MARTIN LEES

By: s/Michelle C. F. Derrico
Of Counsel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Leave to File Amended Complaint was served via CM/ECF system, which will send notification of such filing all counsel of record, this 14th day of June, 2021.

/s/ Michelle C. F. Derrico
Of Counsel